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16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18 NAVAJO HEALTH FOUNDATION – SAGE
19 MEMORIAL HOSPITAL, INC. (doing
business as “Sage Memorial Hospital”); an
20 Arizona non-profit corporation,

21 Plaintiff,

Case No. 2:19-cv-0329-GMN-EJY

22 vs.

23 RAZAGHI DEVELOPMENT COMPANY,
24 LLC; a Nevada limited liability company
(doing business as “Razaghi Healthcare”),
25 AHMAD R. RAZAGHI; individually, TAUSIF
HASAN; individually, DOES 1-10;

**JOINT STIPULATION TO EXTEND
PLAINTIFF’S TIME TO RESPOND TO
DEFENDANTS’ MOTION TO DISMISS
PLAINTIFF’S THIRD AMENDED
COMPLAINT**

(FIRST REQUEST)

26 Defendants.
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1 Pursuant to Federal Rule of Civil Procedure (“FRCP”) 6 and the Court’s Local Rule of
2 Civil Practice 7-1, the parties hereby stipulate, subject to the Court’s approval, to permit
3 Plaintiff additional time, to and until September 16, 2022, to respond to Defendant’s motion to
4 dismiss (ECF No. 201) Plaintiff’s Third Amended Complaint (ECF No. 192). Presently,
5 Plaintiff’s response to the motion to dismiss is due on September 2, 2022. This is Plaintiff’s
6 first request for an extension of time for the reasons cited herein.

7 In support of this Stipulation, the parties agree to the following:

8 1. Good cause exists to support this request for additional time. The parties have
9 communicated regarding the pending motion to dismiss and counsel for Plaintiff has notified
10 counsel for Defendants that due to competing case commitments additional time is needed to
11 properly respond to the pending motion. Counsel for Plaintiff, Paul Padda, has been tasked
12 with drafting an initial response subject to review by his co-counsel. However, during the past
13 week, Paul Padda has been busy with discovery matters in three other cases including having to
14 draft an appellate brief. The additional time requested herein will permit Plaintiff’s counsel
15 sufficient time to draft and file a response to the pending dispositive motion.

16 2. Counsel for the respective parties have communicated regarding this Stipulation and
17 agree that an extension of time to and until September 16, 2022 to permit Plaintiff to file a
18 response to the pending dispositive motion is appropriate under the circumstances.

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1 The parties respectfully request the Court approve this Stipulation.

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3 /s/ *Kris Leonhardt*

4 Pavneet S. Uppal, Esq.
5 Kris Leonhardt, Esq.
6 Jeffrey D. Winchester, Esq
6 *Counsel for all named Defendants*

7 Dated: September 1, 2022

2
3 /s/ *Paul S. Padda*

4 Kathleen Bliss, Esq.
5 Paul S. Padda, Esq.
6 David Stander, Esq.
6 Douglass A. Mitchell, Esq.
6 *Counsel for Plaintiff,
Counterdefendant and Third-Party
Defendants*

7 Dated: September 1, 2022

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10 **IT IS SO ORDERED:**

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13 _____
14 UNITED STATES _____ JUDGE

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16 DATED: September 1, 2022

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